

**TECHNICAL REVIEW AND EVALUATION  
OF SIGNIFICANT REVISION TO  
AIR QUALITY PERMIT NO. M190310P-00**

**I. INTRODUCTION**

This significant permit revision is for Arizona Portland Cement Company, for their Portland cement plant in Pima County. This revision will incorporate the existing Twin Peaks Rock and Stone plant into the permit. The permit conditions for this plant will be contained in Attachment “D” to the Operating Permit.

**Company Information**

**Facility Name:** Arizona Portland Cement Company

**Facility Address:** 11115 N. Casa Grande Highway  
Rillito, Pima County, AZ 85654

**Mailing Address:** PO Box 595  
Rillito, AZ 85654

**II. FACILITY DESCRIPTION**

California Portland Cement Company (CPCC) owns the Twin Peaks Rock and Stone aggregate plant adjacent to the Arizona Portland Cement Company (APCC) cement plant and quarry in Rillito, Arizona. APCC is a wholly owned subsidiary of CPCC.

The Twin Peaks Rock and Stone aggregate plant crushes and screens a portion of stockpiled waste rock/overburden from APCC’s quarry for sale into the local market. To allow CPCC to respond to variations in market demand, CPCC proposes to operate the equipment that is currently located at the plant, as well as portable crushing and screening equipment that would be located at the aggregate plant in the future, in various configurations. The total quantities of rock processed by the aggregate plant and aggregate produced will be limited to 800,000 tons per year (tpy).

**III. EMISSIONS**

The regulated air pollutants that are emitted by the plant include total particulate matter (PM) and particulate matter less than or equal to 10 microns nominal aerodynamic diameter (PM<sub>10</sub>). Portable equipment located at the plant will be powered by on-site electric power. Water sprays are used to control emissions throughout the existing equipment at the plant, and will also be used on portable equipment operated at the facility. The facility is also surrounded by a berm, which further reduces wind speeds. The plant has a potential to emit, after controls, of 14.0 tpy of PM, and 4.4 tpy of PM<sub>10</sub>, for the worst-case equipment configuration.

**IV. PREVIOUS PERMIT**

Permit No.	Permit Type
M190310P1-00	Class I Air Quality Permit

**V. APPLICABLE REGULATIONS**

Table 1, on the following page, displays the applicable requirements for each equipment type under this proposed permit revision.

**Table 1: Verification of Applicable Regulations**

<b>Unit ID</b>	<b>Applicability date</b>	<b>Control Equipment</b>	<b>Applicable Regulations</b>	<b>Verification</b>
Crushing and Screening Plants (NSPS)	After August 31, 1983	Wet Scrubbers, Spray Bars, wet suppressant, and enclosures	40 CFR 60.670(a) 40 CFR 60.670(c) 40 CFR 60.670(e) 40 CFR 60.670(f) 40 CFR 60.672(b) 40 CFR 60.672(c) 40 CFR 60.672(d) 40 CFR 60.672(e) 40 CFR 60.672(g) 40 CFR 60.672(h) 40 CFR 60.674(a) 40 CFR 60.674(b) 40 CFR 60.675(a) 40 CFR 60.675(b) 40 CFR 60.675(c) 40 CFR 60.675(e) 40 CFR 60.675(f) 40 CFR 60.675(h) 40 CFR 60.676(a) 40 CFR 60.676(c) 40 CFR 60.676(d) 40 CFR 60.676(f) 40 CFR 60.676(g) 40 CFR 60.676(h) 40 CFR 60.676(i)	New Source Performance Standards Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants. Affected facilities include crushers, grinding mill, screening operation, bucket elevators, belt conveyors, bagging operations, storage bins, and enclosed truck or railcar loading stations that commenced construction, reconstruction, or modification after August 31, 1983.
Crushing and Screening Plants (Non-NSPS)	Before August 31, 1983	Wet Scrubbers, Spray Bars, wet suppressant, and enclosures	A.A.C. R18-2-722.A A.A.C. R18-2-722.B A.A.C. R18-2-722.C A.A.C. R18-2-722.D A.A.C. R18-2-722.E A.A.C. R18-2-722.F A.A.C. R18-2-722.G	Standards of Performance for Existing Gravel or Crushed Stone Processing Plants.

## **VI. MONITORING AND RECORD KEEPING REQUIREMENTS**

### **A. Opacity Monitoring Requirements**

The permit specifies opacity limitations for the various equipment types at the facility. The source is required to perform monthly visual surveys, and pending the results of the surveys, the permit may require the source to perform a six-minute Method 9 observation of the plume.

### **B. Record Keeping Requirements**

The Permittee is required to keep records of the date, time, and the results of any Method 9 observation made, as well as the name of the observer who conducted the test. If the observation shows an exceedance of an opacity limit, the Permittee is required to take corrective action, and keep a log of what action was taken (as well as report it to ADEQ as an excess emission event).